

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

NEW ENGLAND SPORTS )  
NETWORK, L.P., )  
Plaintiff )  
v. )  
ALLEY INTERACTIVE LLC (CT), and )  
ARIEL LEGASSA, )  
Defendants )

Criminal No. 22-CV-10024-ADB

**Renewed Motion For Order Compelling Response To  
Request for Production of Documents**

Defendant Ariel Legassa “Legassa” hereby renews his motion for an order compelling plaintiff New England Sports Network, L.P. (“Plaintiff” or “NESN”) to respond to Defendant Ariel Legassa’s First Request For Production of Documents (the “Document Request”). The Document Request was delivered to NESN by email and mail on July 19, 2022.

NESN has produced no documents. On October 4, 2022, Legassa filed a Motion to Compel Response to Request for Production of Documents (Dkt. No. 65) (the “Motion to Compel”). NESN responded by addressing the merits of the Motion to Compel, and by requesting that the court stay this lawsuit, which NESN brought. On October 19, 2022 (Dkt. No. 67), the court entered an order stating that it construed the request for a stay that NESN had embedded in its opposition to the Motion to Compel as a motion for stay and directed Legassa to respond. The court also denied Legassa’s Motion to Compel but did so “with leave to renew if warranted.” *Id.* Legassa responded to NESN’s motion for a stay and the court subsequently denied it (Dkt. No. 69).

In light of the court's denial of NESN's motion for stay, the renewal of Legassa's Motion to Compel is both appropriate and warranted. The motion is fully briefed and ready for the court's review. For all of the reasons set forth in Legassa's Motion to Compel, the court should compel NESN to respond to the Document Request and produce all responsive materials by December 30, 2022. The parties anticipate reaching agreement on the terms of a protective order prior to that date.

**Certificate of Compliance With Local Rule 7.1(a)(2)**

Undersigned counsel hereby certifies that he has conferred with Plaintiff's counsel by emails on November 30, 2022 and has attempted in good faith to resolve or narrow the issues presented in this motion. The parties were unable to do so.

**Request For Hearing**

Legassa requests a hearing on this motion at the court's earliest convenience.

Respectfully submitted,

ARIEL LEGASSA,  
by his attorney

/s/ *E. Peter Parker*  
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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on November 30, 2022.

/s/ E. Peter Parker

E. Peter Parker